Davor Rukavina, Esq.
Texas Bar No. 24030781
Kathleen M. Patrick, Esq.
Texas Bar No. 24037243
Jonathan L. Howell, Esq.
Texas Bar No. 24053668
MUNSCH HARDT KOPF & HARR, P.C.
3800 Lincoln Plaza
500 North Akard
Dallas, Texas 75201
Telephone: (214) 855-7500
Facsimile: (214) 978-5359

PROPOSED ATTORNEYS FOR THE DEBTORS-IN-POSSESSION

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re:	\$ CASE NO. 09-45785-rfn-11
LEWIS EQUIPMENT COMPANY, INC.,	3
Debtor.	<pre>\$</pre>
In re:	<pre> § § CASE NO. 09-45786</pre>
LWL MANAGEMENT, LLC,	§
Debtor.	§ (Chapter 11) § §
In re:	§ § CASE NO. 09-45787
HARDROCK MACHINE SHOP, LLC,	§
Debtor.	<pre> § (Chapter 11) § §</pre>
In re:	§
GREAT WHITE TRANSPORTATION, LLC,	§ CASE NO. 09-45788 §
Debtor.	§ (Chapter 11) §
	§ <u>§</u>
	§

In re:	§
LEWIS CRANE & HOIST, INC.,	§ CASE NO. 09-45790 §
Delston	§ (Chapter 11)
Debtor.	\$
	§
In re:	§ § CASE NO. 09-45792
ROCK ISLAND RIGGING, INC.,	§ SIBE 1(0. 6) 15792
Debtor.	§ (Chapter 11)
Debtor.	8 §
	<u> </u>
In re:	§ 8
	§ CASE NO. 09-45814
HARDROCK ROAD PROPERTIES, LLC,	§ (Chapter 11)
Debtor.	§ (Chapter 11) §
	Š

MUNSCH HARDT KOPF & HARR, P.C.'S DISCLOSURE OF COMPENSATION PURSUANT TO 11 U.S.C. § 329 AND FED. R. BANKR. P. 2016(B)

TO THE COURT, THE U.S. TRUSTEE, AND ALL PARTIES-IN-INTEREST:

Pursuant to 11 U.S.C. § 329, FED. R. BANKR. P. 2016(b) and N.D. TX L.B.R. 2016.1(a), Munsch Hardt Kopf & Harr, P.C. ("Munsch Hardt"), proposed attorneys for Lewis Equipment Company, Inc., LWL Management, LLC, Hardrock Machine Shop, LLC, Great White Transportation, LLC, Lewis Crane & Hoist, Inc., Rock Island Rigging, Inc., and Hardrock Road Properties, LLC (the "Debtors"), the debtors-in-possession in the above styled and numbered bankruptcy cases (the "Bankruptcy Cases"), hereby makes the following disclosures:

1. On September 18, 2009 (the "<u>Petition Date</u>"), the Debtors filed their voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code (the "<u>Bankruptcy Code</u>"), thereby initiating the Bankruptcy Cases and creating their bankruptcy estates (the "<u>Estates</u>").

- 2. The Debtors have retained Munsch Hardt to serve as their bankruptcy counsel in the Bankruptcy Cases. The Debtors have agreed to compensate Munsch Hardt for time expended by its attorneys and paraprofessionals in representing the Debtors at the normal hourly rates charged by Munsch Hardt for cases of the same size and complexity as the Debtors' Bankruptcy Cases.
- 3. Munsch Hardt's hourly rates for the attorneys and paraprofessionals who will most likely be working on the Bankruptcy Case are:

Davor Rukavina, Shareholder \$330.00 per hour Kathleen M. Patrick, Associate \$275.00 per hour

Audrey Monlezun, Paralegal \$180.00 per hour (reduced rate)

- 4. Munch Hardt may require the services of its other attorneys and/or paralegals in connection with the Bankruptcy Cases, as may become appropriate under the circumstances. Munsch Hardt's rates are subject to adjustment in accordance with Munsch Hardt's established billing practices and procedures. Specifically, Munsch Hardt's hourly rates are routinely subject to review and modification, as warranted, at year-end.
- 5. The Debtors have further agreed to reimburse Munsch Hardt for all actual out-of-pocket expenses incurred by Munsch Hardt in its representation of the Debtors, as may be approved by the Court.
- 6. Munsch Hardt has not shared or agreed to share any portion of its compensation or reimbursement in connection with the Bankruptcy Cases with any other person or law firm, except as permitted by 11 U.S.C. § 504(b)(1).
- 7. On or about July 15, 2009, the Debtors provided Munsch Hardt with a retainer in the amount of \$100,000.00 on the account of Lewis Equipment Company. On August 25, 2009, Munsch Hardt drew on the retainer in the amount of \$16,602.25, for services rendered and expenses advanced. Thereafter, on the day prior to the Petition Date, Munsch Hardt drew on the

retainer in the amount of \$45,572.22, for services rendered and expenses advanced. On the Petition Date, Munsch Hardt drew on the retainer in the additional amount of \$7,273.00, for the filing fees for filing the Bankruptcy Cases (\$1,039.00 per petition). Accordingly, as of the Petition Date, \$30,552.53 remains in retainer. Munsch Hardt will hold the said retainer and will not apply it without authority from this Court.

8. Other than as disclosed herein, Munsch Hardt has received no payment from the Debtors or any other source for services rendered, or to be rendered, to the Debtors in connection with the Bankruptcy Cases.

RESPECTFULLY SUBMITTED this 21st day of September, 2009.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina

Davor Rukavina, Esq. Texas Bar No. 24030781

Kathleen M. Patrick, Esq.

Texas Bar No. 24037243

Jonathan L. Howell, Esq.

Texas Bar No. 24053668

3800 Lincoln Plaza

500 North Akard

Dallas, Texas 75201

Telephone: (214) 855-7500 Facsimile: (214) 855-7584

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